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March 15, 2022

VIA ECF

Honorable Pamela Chen
United States District Court
Eastern District Of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: 1:20-cv-02636 (Minhye Park v. David Kim, M.D.)

Dear Magistrate Judge Bloom:

As the Court is aware, this office represents the Plaintiff in the above action. This letter is respectfully submitted to request leave for the Plaintiff to move to compel discovery and/or renew her motion for sanctions against Defendant and his counsels, to strike pleadings , and to request that the Court hold a settlement conference in this matter. Plaintiff is making this application because she has complied with discovery but has not received various materials from Defendant, as set forth below. Plaintiff has previously requested a settlement conference; by Order dated August 11, 2021, the Court denied Plaintiff's request for a settlement conference without prejudice, pending Plaintiff's compliance with a discovery order issued on that date.

Plaintiff seeks to renew sanctions against Defendant and his counsels filed on September 22, 2021. Pursuant to ***Fed. R. Civ. P.*** 12(f), Plaintiff seeks to strike the pleadings of the Motion to Dismiss for discovery non-compliance. Plaintiff complied with the discovery Order, but the Defendant failed to comply with the Order dated January 13, 2022. Defendant's motion to dismiss is immaterial and must be stricken. Also pursuant to Rule 37, this Court has an authority to impose sanctions against Defendant by striking pleadings.

Based on the foregoing, it is respectfully requested that the Court issue appropriate orders with regard to discovery. In addition, it is respectfully requested that the Court schedule a settlement conference based on the fact that the parties have exchanged discovery.

We thank the Court for its courtesy and consideration herein and respectfully await the Court's rulings.

Respectfully submitted,

/s/ Jae S. Lee
Jae S. Lee

